

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA GIUFFRE,

Plaintiff,

v.

ALAN DERSHOWITZ,

Defendant.

Civil Action No. 1:19-cv-3377 (LAP)

**DECLARATION OF HALEY N.  
PROCTOR**

ALAN DERSHOWITZ,

Counterclaim Plaintiff,

v.

VIRGINIA L. GIUFFRE,

Counterclaim Defendant.

HALEY PROCTOR hereby declares pursuant to 28 U.S.C. § 1746 as follows:

1. I make this declaration in support of Plaintiff Virginia Giuffre's motion for leave to file an Amended Complaint.
2. Attached hereto as **Exhibit A** is a true and correct copy of the Amended Complaint Plaintiff proposes to file.
3. Attached hereto as **Exhibit B** is a true and correct copy of the proposed Amended Complaint in which the non-formatting changes from the Complaint are identified in redline.
4. Attached hereto as **Exhibit C** is a true and correct copy of a transcript of the December 2, 2019, status conference held before the Court and referred to in the accompanying memorandum of law.

Dated: December 20, 2019

/s/ Haley N. Proctor  
Haley N. Proctor